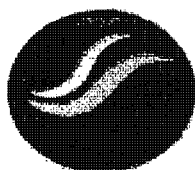


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2005 JUL 28 P 5:00



GREAT PACIFIC
BIOPRODUCTS LTD.

July 20, 2005

Arthur Neal, Director, Program Administration
National Organic Program, USDA-AMS-TMP-NOP
1400 Independence Ave., SW.
Room 4008-So., Ag Stop 0268
Washington, DC 20250

Fax: (202) 205-7808

Dear Sir,

We were recently notified by OMRI of the opportunity to provide public input to the pending review of currently allowed synthetic substances used in production of OMRI approved products for use in organic crop production.

Our company's product - Pacific Natural liquid fish fertilizer - is OMRI Listed and is stabilized by food grade phosphoric acid to bring the finished product to an allowable pH of 3.5. This acid is part of our proprietary formula and production process. By adding this acid to our product, benefits accrue to our customers in the US market in the form of extended shelf life of the product as well as the soil and crop fertility benefits of the added phosphate to our fish hydrolysate.

Therefore, please accept this letter as our support and request to continue, or to extend, the permitted use of phosphoric acid as a stabilizer to fish fertilizers in organic crop production.

Should further information be required, please contact me.

Thank you,

Yours truly,

Michael Renwick
Managing Director